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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BEVERLY J. WATKINS, an individual

Case No: 2:16-cv-01105-APG-(PAL)

Plaintiff,

vs.

UNIVERSITY MEDICAL CENTER a.k.a.
UNIVERSITY MEDICAL CENTER OF
SOUTHERN NEVADA a.k.a. UMC, a
political subdivision of Nevada; DOES I-V;
ROES VI-X.

**STIPULATION AND ORDER
TO
STAY THE CASE PENDING
SETTLEMENT APPROVAL**

Defendants.

Plaintiff BEVERLY WATKINS and Defendant UNIVERSITY MEDICAL CENTER (“UMC”), by their undersigned counsel of record, hereby stipulate and agree to stay the proceedings in this case pending approval by Defendant’s Governing Board of a proposed settlement.

The parties in this case have reached a tentative settlement. However, the settlement terms must be approved by Defendant University Medical Center of Southern Nevada's Governing Board (hereinafter "Board"). The Board does not meet until August 23, 2017. As such, the parties request a short stay of the discovery proceedings to allow the Board to consider and adopt the

1 proposed settlement. The parties further stipulate that should this matter not lead to settlement, the
2 remaining discovery deadlines be extended by the duration of the stay (by 2 months).

3 The short stay is not intended to unduly delay the case but rather to save the parties from
4 expending further fees and costs in proceeding with discovery while the settlement is pending
5 review.

6
7 DATED this 30th day of June, 2017.

8 MORRIS, SULLIVAN, LEMKUL
9 & PITEGOFF

10 */s/ Jeffrey I. Pitegoff, Esq.*

11 _____
12 Jeffrey I. Pitegoff, Esq.
13 Nevada Bar No.: 5458
Daniel S. Cereghino, Esq.
14 Nevada Bar No. 011534
3770 Howard Hughes Pkwy, Suite 170
Las Vegas, NV 89169
Attorney for Defendant

15 DATED this 30th day of June, 2017.

16 LAW OFFICE OF DAN M. WINDER, P.C.

17 */s/ Kristina Miletovic, Esq.*

18 _____
Dan M. Winder, Esq.
Nevada Bar No. 001569
Kristina Miletovic, Esq.
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Attorney for Plaintiff

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ORDER

29 IT IS HEREBY ORDERED that all proceedings shall be stayed until August 30, 2017, to
allow Defendant's Board to review, consider and decide whether to adopt the proposed settlement.

30 IT IS ALSO ORDERED should the Board not approve settlement, the remaining discovery
31 deadlines in this matter shall be extended by 2 months, by a separate stipulation submitted by the
32 parties.

33 **IT IS SO ORDERED this 17th day of July, 2017:**

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35 
36 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I DO HEREBY CERTIFY that service of the foregoing: **STIPULATION AND ORDER**

TO STAY THE CASE PENDING SETTLEMENT APPROVAL was made this 30th day of

4 | June, 2017, by:

- [] **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada, addressed as set forth below.

[] **BY FACSIMILE:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document.

[] **BY PERSONAL SERVICE:** by causing personal delivery by an employee of MORRIS SULLIVAN LEMKUL & PITETGOFF of the document(s) listed above to the person(s) at the address (es) set forth below.

[X] **BY ELECTRONIC SERVICE:** by transmitting via the Court's electronic CM-ECF filing services the document(s) listed above to the Counsel set forth below on this date pursuant to FRCP Rules.

KRISTINA MILETOVIC, ESQ.

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- [] **BY ELECTRONIC MAIL:** by transmitting via the internet the document(s) listed above to the email address listed in the Nevada Legal Directory to Counsel set forth below on this date.

/s/ Victoria Grant

An Employee of MORRIS, SULLIVAN, LEMKUL & PITEGOFF